

1 Scott A. Burroughs (SBN 235718)  
2 scott@donigerlawfirm.com  
3 DONIGER / BURROUGHS  
4 603 Rose Avenue  
5 Venice, California 90291  
6 Telephone: (310) 590-1820

7 *Attorneys for Plaintiff*

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9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 DUSTIN NEFF,

12 Plaintiff,

13 **Case No. 5:23-cv-02518-EKL**

14 v.

15 **STATUS REPORT**

16 SBA ENTERTAINMENT, LLC, *et al.*,

17 Defendants.

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1 Plaintiff, Dustin Neff, hereby submits this STATUS REPORT to apprise  
2 the Court as to Neff's progress in prosecuting his claims. Plaintiff's counsel has  
3 reached out to various counsel to obtain further information as to status.

4 As to Defendants Chicken Soup for the Soul Entertainment, Inc. and  
5 TOFG, LLC, their Chapter 7 bankruptcy proceedings persist in U.S.  
6 Bankruptcy Court, District of Delaware under docket number 24-11442-MFW.  
7 We reached out to counsel in that case and there have been no developments  
8 that would impact this case.

9 In the Status Conference held on August 14, 2025, the Court issued an  
10 Oral Order to Show Cause "as to Defendants Goode Enterprise Solutions Inc.  
11 and SBA Entertainment, LLC regarding their failure to obtain counsel." Dkt.  
12 61. To date, these Defendants have not yet obtained counsel. We contacted their  
13 former counsel and was advised that counsel may be obtained in the near future.  
14 If they do not comply with the Court's Order by October 14, 2025, Neff will  
15 file a Motion for Default Judgment against Goode Enterprise Solutions Inc. and  
16 SBA Entertainment, LLC.

17 Plaintiff has also researched additional parties relevant to this action, including  
18 James Corey Goode and related entities, and will seek leave to amend the complaint to  
19 name these parties within seven days of new counsel appearing for the Goode and  
20 SBA entities. Should no new counsel be obtained, Neff will seek leave to amend on or  
21 before October 28, 2025.

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23 Respectfully submitted,

24 Dated: October 1, 2025

25 By: /s/ Scott A. Burroughs  
26 Scott A. Burroughs, Esq.  
DONIGER / BURROUGHS  
27 Attorneys for Plaintiff